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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
OCEAN LINE HOLDINGS LIMITED,	:
	:
Plaintiff,	:
	:
- against -	:
	:
CHINA NATIONAL CHARTERING CORPORATION,	:
	:
Defendant.	:
-----X	

07 Civ. 8123 (DC)  
ECF Case

**DECLARATION OF PATRICK F. LENNON  
IN SUPPORT OF DEFENDANT'S MOTION TO VACATE MARITIME ATTACHMENT  
OR IN THE ALTERNATIVE FOR COUNTERSECURITY**

Patrick F. Lennon declares under penalty of perjury under the laws of the United States of America as follow:

1. I am a partner in the law firm Lennon, Murphy & Lennon, LLC, counsel for the Defendant herein, China National Chartering Corporation, also known as Sinochart.
2. I submit this Declaration in support of Sinochart's motion pursuant to Supplemental Admiralty Rule E(4)(f) for an order vacating the September 20, 2007 Ex Parte Order for Process of Maritime Attachment and Garnishment in the amount of \$177,520,838 or in the alternative for an order pursuant to Supplemental Admiralty Rule E(7) directing Plaintiff to post countersecurity in the sum of \$9,640,457.89.

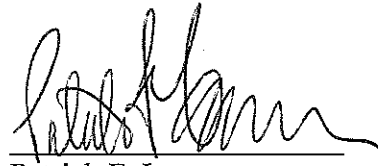
3. In its Verified Complaint Plaintiff has claimed damages against Sinochart in the sum of \$177,520,838, inclusive of interest, costs and legal fees, and it has obtained an Ex Parte Order dated September 20, 2007 authorizing the attachment of Sinochart's property up to that amount.

4. Based on various notices received from Plaintiff's counsel, as well as email and verbal communications with Plaintiff's counsel, as of the date of this motion, Plaintiff has attached Sinochart's property in the hands of various garnishee banks in the sum of **\$22,266,247.93**.

5. I attach hereto as Exhibit "1" Sinochart's Verified Answer and Counterclaim which is referred to in Sinochart's supporting Memorandum of Law and which forms the basis for Sinochart's Motion for Countersecurity.

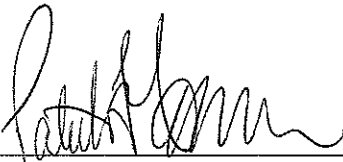
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18<sup>th</sup> day of October 2007.

  
Patrick F. Lennon

**AFFIRMATION OF SERVICE**

I hereby certify that on October 18, 2007, a copy of the foregoing Notice of Motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By:   
Patrick F. Lennon